

EXHIBIT A

MCKEE FOODS CORPORATION

vs.

BFP INC., et al.

CARTER LAWRENCE

November 25, 2024

Checuga Reporting, Inc.

(615)499-9320

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1 UNITED STATES DISTRICT COURT
2 EASTERN DISTRICT OF TENNESSEE
3 AT CHATTANOOGA

4 MCKEE FOODS CORPORATION,

5 Plaintiff,

6 vs.

Case No. 1:21-CV-00279

7 BFP INC. D/b/a THRIFTY MED PLUS
8 PHARMACY, STATE OF TENNESSEE,
9 And CARTER LAWRENCE in his Official
Capacity as COMMISSIONER OF THE
TENNESSEE DEPARTMENT OF
COMMERCE AND INSURANCE,

10 Defendants.

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15 Video Deposition of:

16 CARTER LAWRENCE

17 Taken on behalf of the Plaintiff
18 November 25, 2024

19 Commencing at 9:16 a.m. CST
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24 Checuga Reporting, Inc.
25 Michelle Cessna, LCR, RPR
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1 sound more formal than it really is, but set up
2 this group in order to make sure that there
3 would be proper information sharing and
4 involving -- getting legal opinion in order to
5 make sure that we did what the law requires of
6 us and that we would stay on track for all
7 relevant deadlines.

8 Q. Does this group discuss ERISA preemption?

9 A. We have discussed ERISA preemption.

10 Q. And tell me what the substance of that
11 discussion was.

12 A. I believe that we would have asked legal
13 counsel about the relevant court decisions and
14 looked at the law that we had and discussed the
15 path forward, which, as I mentioned earlier,
16 was -- is to enforce the law that we have
17 unless a court told us otherwise, but to move
18 forward with the implementation of the State
19 law.

20 Q. Including against self-insured ERISA
21 plans, correct?

22 A. Yes.

23 Q. Obviously not everyone whom we have
24 identified as being part of this PBM group is
25 in the PBM section. Is -- is there a reason